

COMMONWEALTH of VIRGIN

AUG 2 0 2002

DEPARTMENT OF ENVIRONMENTAL QUALITY

W. Tayloe Murphy, Jr. Secretary of Natural Resources SOUTH CENTRAL REGIONAL OFFICE 7705 Timberlake Road, Lynchburg, Virginia 24502 (434) 582-5120 Fax (434) 582-5125 www.deq.state.va.us

August 15, 2002

Robert G. Burnley Director

Thomas L. Henderson Regional Director

WARNING LETTER

Ms. Remonia Davis Environmental Engineer BGF Industries, Inc. 401 Amherst Avenue Altavista, VA 24517



RE:

Resource Conservation and Recovery Act (RCRA)

Compliance Evaluation Inspection (CEI) on July 15/16, 2002

BGF Industries, Inc. - EPA ID#VAD119071314

Dear Ms. Davis:

Thank you for your cooperation during the Compliance Evaluation Inspection (CEI) conducted at the above referenced facility on July 15/16, 2002, by the Department of Environmental Quality (DEQ), South Central Regional Office. Based on information provided during the inspection, the facility was evaluated for compliance with the Virginia Hazardous Waste Management Regulations (VHWMR) as a Large Quantity Generator (LQG). The appropriate checklists completed for the inspection are enclosed. Based on the inspection, the Department has reason to believe that the facility may be in violation of the VHWMR. I have summarized the available information and identified the applicable laws and regulations.

1. As required by 40 CFR 264/265.174, the operator must, at least weekly, inspect areas where containers are stored, looking for leaking containers and for deterioration of containers. During the inspection it was observed that several inspection logs between March and May, 2002 were not completed.

Please review the above and submit a written explanation within twenty (20) calendar days of the date of this letter regarding the corrective actions your facility intends to take or has taken to correct the situation. Failure to respond may result in enforcement action by DEQ. This Warning Letter is not an agency proceeding or determination which may be considered a case decision under the Virginia Administrative Process Act, Va. Code § 2.2-4000 et seq.

The DEQ appreciates the facility's efforts in proper waste management. If you should have further questions or need assistance in the future, please do not hesitate to contact me at (434) 582-5120.

Difficulty

Jan B. Walwyn

Environmental Specialist II

Enclosures

c: Mr. Michael Sexton, DEQ-SCRO Sanjay Thirunagari, DEQ-OTA

DEQ - SCRO Files

An Agency of the Natural Resources Secretariat

DEPARTMENT OF ENVIRONMENTAL QUALITY WASTE DIVISION

SURVEY SHEET
FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

Name	Name of Facility: BGF Industries, Inc.			
Addre	ess:	401 Amhersi Avenue Altavista, VA 24517		
EPA ID Number:		VAD119071314		
Facili	ty Representative:	Remonia Davis, Environmental Engineer		
Telep	hone Number:	(434) 369-4751		
Inspec	ctor(s):	Jan B. Walwyn, Environmental Specialist II		
Date o	of Inspection:	July 15/16, 2002		
*****	*********	*********************	*****	******
1.	What is the business activ	ity of the firm? (i.e., furniture manufacturing, metal plating, recycling)		
	Textile manufacturing.			
3.	firm. Waste combustible, liquid Waste corrosive, liquid — Waste toxic liquids, organ Waste flammable, liquids Hazardous waste, liquid (List (a) the nominal amou accumulated/generated at 1000 kg accumulation, or Waste Type Based on the Biennial Rep	nic (Phenol)— U188 s (various chemicals & solvents) – (D001, D002, D035, F002, F003, F005, U133) (water, volan) – D007 Ints of hazardous waste generated in any month; and (b) the greatest amounts of all the site, if applicable to generator category determination (e.g. if a CESQG, have the site of a SQG have they ever exceeded 1000 kg/mo generation for all waste streams age over the submitted in 2001, the facility is definitely a LQG.	waste	es ever ver exceeded
4.	a) Has the facility genera b) Has the facility genera c) Has the facility accum for their generator clas [Note: a CESC a SQG may no more than 180 accumulate for d) Has the facility episoc [Note: Applica generation and	dicovered by this inspection: ated >1 kg/mo of ACUTE hazardous waste (P-list) ated >100 kg of ACUTE hazardous waste from spill clean-up residue? ated >100 kg of ACUTE hazardous waste from spill clean-up residue? ated >100 kg of ACUTE hazardous waste from spill clean-up residue? ated >100 kg of ACUTE hazardous waste from spill clean-up residue? ated >100 kg of accumulate setablished to se	Y Y Y	<u>N</u> <u>N</u> <u>N</u> <u>N</u>

•					
5.	How is the waste presently being har List all transporters and facilities and				
	Transporter(s):				
	St. Joseph Motor Lines	[PAD987358587]			
	Envirochem	[NCD982170292]			
	Fisher Industrial	[ALD981020894]			
	Maumee Express, Inc.	[NJD986607380] [VAD000122994]			
	Environmental Options Freehold Cartage, Inc.	[NJD054126164]			
	TSD(s):	[1.02034120101]			
	Safety-Kleen Systems, Inc.	[SCR000075150]			
	• •	[VAD000737361]			
	Safety-Kleen Systems, Inc.	•			
	Safety-Kleen (TS), Inc.	[NCD000648451]			
	Southeastern Chemical & Solvent	[SCD036275626]			
	Republic Env. Systems	[PAD085690592]			
	Fluorescent Bulbs to:				
	AERC.com, Inc.				
	NE Lamp Recyclers.				
6.	Does the facility generate any hazard on-site, used as a substitute for a CC and the basis for exclusion.			YES	<u>NO</u>
7.	Used Oil Management:				
٠	a) Does the facility generat		pecification <u>only</u> pec/on-spec		
	b) Does the facility transpo	rt used oil ?(notification require	ed) Y <u>N</u>		
		or Burn off-specification used of Used Oil Checklist]	oil? Y <u>N</u>		
		ed oil in an on-site space heater ce requirements and comment]	? Y <u>N</u>		
	e) Does the facility miv has	ardous waste with used oil?	Y <u>N</u>		
		site CESQG HW?	Y N		
	Is this ignitable o		Y N		
	[For any mixing,	provide comment and evaluate t	for Part 279 compliance]		
	used oil reclaimer?	lelivery of used oil to a legitimat	te <u>Y</u> N		
	Please specify and list:		<u>I</u> N		
		any owns the forklifts and servic	es them. The used oil and		
	filters go to Safety-Kleen.	•			
	g) Used Oil Filters:				
		or manage used oil filters?	Y <u>N</u>		
		or manage these under the filter			
	language of Part 2		Y N		
	Are the filters ma	naged in such a manner to meet			
	the conditions of		Y N		
	Specify managem See 7(f)	ent method(s):			
				VEC	Mo
8.	Does the facility generate any hazardo amounts of gold, silver, platinum, pal			YES	<u>NO</u>

If YES, list the waste and where it is sent. Verify compliance with Part 266 Subpart F and provide

	comment.		
9.	Does the facility generate, transport, store, collect, or reclaim spent lead facility stores batteries before reclaiming them, complete the Metals Re		YES <u>NO</u>
	NOTE: Homestead services the forklifts, and manages the lead-acid batteries go to Weldex (NYD030485288), while smaller batteries go (AID046481032).		
0.	Based on the above preliminary information the facility is considered to as, a [underline or circle all applicable]: a. Conditionally exempt small quantity generator b. Small quantity generator	be acting as, and is being evalu	ated for this inspectio
	c. Generator		
	d. Permitted or Interim Status TSD		
	e. Unpermitted TSD (explain in comments section)		
	 f. Transporter g. Other: <u>please explain below</u>. (If episodic generation has occur 	red you will need to assign an	annronriate generator
	category for this evaluation and also assess compliance during		appropriate generator
11.	List each container and tank accumulation area. Specify the number and Include any satellite accumulation areas and verify compliance with sate provide comment]		
	Location	Number of C	Containers
	Accumulation Area	19 (55-gal. d	rums)
	Partswashers (serviced by Safety-Kleen)		
	Dormier WR		., 1 @ 30 gal.)
	Ruti WR	4 (2 @ 17 ga	ıl.; 1 @ 30 gal.;
	_	1 (20 1)	1 @ 5 gal.)
	Towmotor Shop	1 (30 gal.).	
	Spec Prod.	1 (30 gal.) 2 (30 gal.)	
	Shop Twisting	1 (30 gal.)	
	Unifil	1 (30 gal.)	
2.	Comments:		
۷.	The facility uses only dot approved drums, therefore meeting the subpart	CC requirements.	

Waste Flow Diagram: No diagram needed at this time.

4. CONTAINERS CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATATION	REGULATION	YES	NO	NA -	NC
And the second s	SECTION A - USE AND MANAGEMENT	1000			
264/265.171	1. Are containers in good condition?	X			
	SECTION B - COMPATIBILITY OF WASTE WITH CONTAINER				
264/265.172	2. Is container made of a material that will not react with the waste which it stores?	X			
	SECTION C - MANAGEMENT OF CONTAINERS				
264/265.173(a)	3. Is container always closed while holding hazardous waste?	X			
264/265.173(b)	4. Is container not opened, handled, or stored in a manner, which may rupture it or cause it to leak?	X			
	SECTION D - INSPECTIONS				
264/265.174	5. Does owner/operator inspect containers at least weekly for leaks and deterioration?		X		X
	SECTION E – IGNITABLE AND REACTIVE WASTES				
264/265.176	6. Are containers holding ignitable and reactive waste located at least 15 m (50 ft) from facility property lines?	Х	-		
The Company of the	PERMITTED FACILITIES ONLY	建筑	W 24 W	newit-	"被狗 "
	SECTION F – INCOMPATIBLE WASTE				
264/265.177(a)	7. Are incompatible wastes or materials placed in the same containers?			Х	
264/265.177(b)	8. Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste?			Х	
264/265.177(c)	9. Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device?			X	
A CONTRACTOR OF THE PROPERTY O	SECTION G = CLOSURE	Carried Carried			
	10. Do container storage areas have a containment system?		X		
264/265.178	11. At closure, were all hazardous wastes and associated residues removed from the containment system?			Х	

COMMENTS:

5. Several inspection logs between March 12 and May 30, 2002 were not completed.

5. GENERATORS CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO *	NA	NC
	SECTION A – MANIFEST				
262.20	Does generator ship waste off-site?	X			
262.20	2. Does generator use manifest?	X			
	a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month?) NOTE: SQGs are only exempt if wastes are			х	
	1. If yes, does generator indicate this when sending waste to a TSD facility?			х	
Part 262 Appendix	b. If yes, does manifest include the following information?				
•	Manifest document no.	X			
	2. Generator's name, mailing address, telephone no.	х			
	3. Generator EPA I.D. no.	X			
	4. Transporter Name(s) and EPA I.D. no.(s)	х			
	5. Facility name, address, and EPA I.D. no.	х			
	6. Alternate facility name, address, and EPAI.D. no.		Х		
	7. Instructions to return to generator if undeliverable	х			
	8. Waste information required by DOT – shipping name, quantity (weight or vol.), containers (type and number)	х			
	9. Emergency information (optional) (special handling instructions, telephone no.)	Х			
	10. Is the following certification on each manifest form?	х			
	"This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable national and international regulations."	Λ			
262.40	Does generator retain copies of manifests? If yes, complete a through g. (§262.23)	х			
	a. Did generator sign and date all manifests?	х			

40 CFR CITATION	REGULATION	YES	NO	NA.	NĆ
	b. Did generator obtain handwritten signature and date of acceptance from initial transporter?	X			
262.40	c. Does generator retain one copy of manifest signed by generator and initial transporter?	х			
262.40	d. Do returned copies of manifest include facility owner/operator signature and date of acceptance?	х			
262.42	12. Have manifests been received from the TSD facility for any waste which was shipped over 45 days ago?		х		
	a. If no, has the generator filed an exception report? b. Does the exception report		Х		
,	include: 1. a legible copy of the manifest for which the generator does not have confirmation of the delivery? and			X	
	2. a cover letter explaining the efforts taken to locate the shipment?			х	
262.11	SECTION B – HAZARDOUS WASTE DETERMINATION				
	3. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)?	х			
	4. Does generator generate solid waste(s) listed in Subpart C that exhibit hazardous characteristics (corrosivity, ignitability, reactivity, TC)?	х			
	a. Does generator determine characteristics by testing or by applying knowledge of processes?	Knov	wledge o	f proces	ses.
	1. If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)?			х	
262.11	5. Has the generator evaluated all solid wastes to determine whether the solid wastes are hazardous wastes?	x			
	SECTION C - PRETRANSPORT REQUIREMENTS	Andrews of the			
262.30	6. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)?	X			
	a. Are containers to be shipped leaking or corroding?		х		
	b. Complete Checklist 4. Containers to evaluate condition of containers.		Attacl	ned.	

40 CFR CITATION		REGULATION	YES	NO	NA	NC
		there evidence of heat generation from compatible wastes in the containers?		X	1 (1) (1) (1) (1) (1) (1) (1) (1) (1) (1	
262.31	Does gener	ator follow DOT labeling requirements ce with 49 CFR 172?	х			
262.32	8. Does gener with 49 CF	ator mark each package in accordance R 172?	х			
262.32	9. Is each con the following	tainer of 110 gallons or less marked with ng label?	v	- 11		
	Disposal. If fo	S WASTE - Federal Law Prohibits Improper und, contact the nearest police or public safety e U.S. Environmental Protection Agency.	X			
		enerator name(s) and address(es)	X			
	b. Ma	anifest document No.	X			
262.33	10. Does generation transporters	ator have placards to offer to?		X		
262.34	11. Accumulati				•	
		e containers used to temporarily store ste before transport?	х			
262.34(a)(2)	1.	If yes, is each container clearly dated.	х			
262.34(a)(3)	2.	If yes, is each container labeled or clearly marked with the words "Hazardous Waste?"	х			
262.34(c)(1)	areas where	nerator have satellite accumulation up to 55 gallons of any one type of vaste (HW) (1qt acutely HW) are d? If yes.		X*		
262.34		e the containers marked with the words				
(c)(1)(ii)	"Н	azardous Waste" or other words that entify the contents of the container?		X		
262.34(c)(1)	13. Are amount	s in excess of those allowed being in the satellite accumulation area?		х		
	am	s the generator marked the excess ount with the date the excess amount gan accumulating? and			х	
	b. Ha exc dat ger pro Na Exc	s the generator either removed the cess amount within three days of the e of excess accumulation or has the herator complied with all other evisions for accumulation areas. mely, has the generator notified the ecutive Director about the location of			х	
		accumulation area?		VB. 8.12 3		
262.40		ORDKEEPING AND RECORDS tor keep the following reports for 3		AND STATES		
	years?	-				
	a. Ma	nifest or signed copies from designated ilities	х			
		ennial reports	X			

40 CFR						***~
CITATION		REGULATION	YES	NO -	NA:	NC
		c. Exception reports	X			
	ļ	d. Test results	X		<u> </u>	
	16.	Where are the records kept (at facility or elsewhere)?		At the	facility.	
	SECT	ION E - SPECIAL CONDITIONS	IN COMME			
	17.	Has the primary exporter received from or transported to a foreign source any hazardous waste?		х		
262.53		a. If yes, has he filed a notice with the Regional Administrator?			х	
262.54		b. Is this waste manifested and signed by a foreign consignee?			х	
262.54		c. If generator transported wastes out of the country, has he received confirmation of delivered shipment?			х	
268	SECT	ION F – LDR REQUIREMENTS				
	18.	Does the facility generate, transport, treat, store or dispose any land-restricted wastes?	х			
	19.	Is land disposal of wastes occurring? If yes,		X		
		a. Has the facility been granted an extension to the effective date for land restriction applicable to its restricted waste? OR			х	
		b. Has the facility been granted an exemption from prohibition pursuant to a petition for those land-restricted wastes and units covered by the petition? OR			х	
		c. Are the wastes hazardous only because they exhibit a hazardous characteristic and are they disposed outside the Commonwealth into an injection well without exhibiting any prohibited characteristic of hazardous waste at the point of injection?			Х	
268.5	22.	Has the owner/operator submitted an application for case-by-case extension to the effective date of any applicable restriction?		х		
268.6	23.	Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units?		х		
268.3	24.	Are facility representatives diluting the restricted waste or residual from treatment of the restricted waste as a substitute for adequate treatment, to circumvent the effective date of prohibition, to otherwise avoid a prohibition, or to circumvent a land disposal prohibition?		х		

40 CFR CITATION	-	REGULATION	YES	NO	NA	NC
268.4	25.	Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments? (Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.)		Х		
	26.	If yes, complete Check Sheet 12. Surface Impoundments.				
	27.	Is the facility treating waste in Tanks or Containers in order to meet applicable treatment standards under 268.40?		X		
268.7(a)(4)	28.	If Yes, has the facility developed a Waste Analysis Plan?		-	Х	
268.7(a)(4)(ii)	29.	Has the Waste Analysis Plan been filed with the Director a minimum of 30 days prior to the treatment activity?			х	
268.7(a)(1)	30.	Restricted wastes, which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied each shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions?	х			
	31.	Did the notification include the following information:				
268.7(a)(1)(i)		a. EPA Hazardous Waste Number?	X			
268.7(a)(1)(ii)		b. The waste constituents that the treater will monitor, if monitoring will not include all regulated constituents?	х			
268.7(a)(1)(iii)		c. The manifest number associated with the shipment of waste? and	х			
268.7(a)(1)(v)		d. Waste analysis data, where available?	X			
268.7(a)(2)	32.	For restricted wastes which the generator has determined can be land disposed without further treatment, has the generator accompanied each shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions set forth in 268.32 or RCRA section 3004(d)?			х	
	33.	Did the notification include the following information:				
268.7 (a)(2)(i)(A)		a. EPA Hazardous Waste Number?			х	
268.7 (a)(2)(i)(B)		b. The waste constituents that the treater will monitor, if monitoring will not include all regulated constituents?			х	
268.7 (a)(2)(i)(C)		c. The manifest number associated with the shipment of waste? And			х	
268.7 (a)(2)(i)(D)		d. Waste analysis date, where available?			х	

40 CFR CITATION	REGULATION	YES	NO	NA	NC
268.7(a)(2)(ii)	34. Was the certification signed by an authorized representative, and did it state the following:				
	"I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."			X	
268.7(a)(3)	35. Has the generator received a case-by-case exemption on restricted waste, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions?		х		
268.7(a)(7)	36. Does the generator retain on-site copies of all notices, certifications, demonstrations, waste analysis data, and other documentation for at least five years from the date the waste was last sent to on-site or off-site treatment, storage or disposal?			х	
	37. Is the generator storing land restricted waste? (For one year storage only)		X		
	38. If yes, is the storage on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment or disposal?			Х	

COMMENTS:

12. Although no satellite accumulation was occurring during the inspection, the operators were able to accurately describe the management procedures that they normally use when the SA is in place. The procedures described by the operator mirrored the requirements set forth by the regulations.

7. HEALTH & SAFETY CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	SECTION A - OUTLINE OF PERSONNEL TRAINING PROGRAM				
264/265.16(d)(3)	Does the facility have a written training program?	х			
264/265.16(a)(1)	2. Does the program consist of:				
	a. strictly classroom instruction?		X		
	b. strictly on-the-job training?		X		
	c. classroom instruction AND on-the-job training?	X			
264/265.16(c)	3. Is an annual refresher course required for personnel whose positions at the facility are related to hazardous waste management?	х			
	SECTION B - JOB TITLE/JOB DESCRIPTION				
264/265.16(d)(1)	4. Is a job title provided for each employee whose position at the facility is related to hazardous waste management?	х			
264/265.16(d)(2)	5. Is a job description provided for each employee whose position at the facility is related to hazardous waste management?	X*			
	SECTION C - TRAINING DIRECTOR				
264/265.16(a)(2)	6. Is the training program directed by a person trained in hazardous waste management?	х			
	SECTION D - RELEVANCE OF TRAINING TO JOB POSITION				
264/265.16(a)(2)	7. Are facility personnel instructed in hazardous waste management procedures (including contingency plan implementation) relevant to their positions?	х			
The state of the s	SECTION E - TRAINING AND EMERGENCY RESPONSE		100		
264/265.16(a)(3)	8. Does the training program include the following emergency response procedures where applicable?				
	a. Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment?	х			
	b. Key parameters for automatic waste feed cut-off systems?	X			
	c. Procedures for utilizing communications or alarm systems?	X			
	d. Directions for responding to fires or explosions?	х			
	e. Procedures for groundwater contamination response?		х		
	f. Procedures for conducting shutdown operations?	x			
	SECTION F - IMPLEMENTATION OF TRAINING PROGRAM				

40 CFR CITATION		REGULATION 5	YES	NO	, NA	NC
264/265.16(b)	9.	Are all facility personnel trained within six months of their employment or assignment to the facility or transfer to a new position?	х			
264/265.16(b)	10.	Are facility personnel allowed to work unsupervised before their training program has been completed?		х		
264/265.16(d)4 and (e)	11.	Are records maintained which document that the required training has been given to and completed by facility personnel?	X			
	A COLUMN TO SERVICE AND ADDRESS OF THE PARTY	ION G - TESTING AND MAINTENANCE OF PMENT				
264/265.33	12.	Does the owner/operator test and maintain (as necessary to assure its proper operation in time of emergency) the following equipment:				
		a. All communications or alarm systems?	X			
		b. Fire protection equipment?	X			
		c. Spill control equipment?	X			
		d. Decontamination equipment?	X			
		ION H - GENERAL INSPECTION REQUIREMEN LITIES ONLY)	TS (PEF	RMITT	ED	
264/265.15(b)(1)	13.	Does the owner/operator maintain a written				
		schedule at the facility for the inspection of:				
		a. Monitoring equipment?			X	
		b. Safety and emergency equipment?			X	
		c. Security devices?			X	
		d. Operating and structural equipment?			X	
		e. Types of problems with equipment:				
		1. Malfunction			X	
		Operator error			X	
V		3. Discharges			X	
264/265.15(b)(3)	14.	Does the schedule identify the types of problems to look for?			Х	
264/265.15(b)(4)	15.	Is the frequency of inspection based on the possible deterioration of equipment and the probability of incident?			x	
264/265.15(b)(4)	16.	Are areas subject to spills, such as loading and unloading areas, inspected daily?			х	
264/265.15(d)	17.	Does the owner/operator maintain an inspection log? If yes, does the log include:			х	
		a. Date and time of inspection?			X	
		b. Name of inspector?			X	
		c. Notations of observations?			X	
		d. Date and nature of repairs or remedial actions?			х	
	18.	Have any malfunctions or other problems not been remedied? (Summarize in comments section.)		Х		
William Commission Association	SECT	ION I - REQUIRED AISLE SPACE	7/10/2-31%			A SALARY
264/265.35	19.	Does the facility maintain aisle space to allow unobstructed movement of personnel, fire	x	na v. masajivili ded	ne go tronista i pocinci di	SOMETHIAN STATE
		protection equipment, spill control equipment, and decontamination equipment?			·	

40 CFR CITATION		REGULATION	YES	NO.	NΑ	NC
264/265.35	20.	If aisle space is not maintained, has the owner/operator demonstrated to the Regional			х	
254957.22	- CE-CE	Administrator that the space is not needed?	- 100 H5 W	. Jayanan Walita w	1944 - CRIME N	
264/265.32		ION J - EQUIPMENT REQUIREMENTS	40 A. A.	MET, MARKE	50,500,000,000	
	21.	Is there evidence of fire, explosion, or contamination of the environment? If yes, explain in the comment section.		х		
	22.	Is the facility equipped with the following:	·		L	
264/265.32(a)	22.	a. An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel?	х			
264/265.32(b)		b. A device such as a telephone (immediately available) or handheld two- way radio capable of summoning emergency assistance from police, fire, or state or local emergency response teams?	х			
264/265.32(c)		c. Portable fire extinguishers?	X			
264/265.32(c)		d. Fire control equipment (including special extinguishing equipment such as foam, inert gas, or dry chemical)?	Х			
264/265.32(c)		e. Spill control equipment?	X			
264/265.32(c)		f. Decontamination equipment?	X			
264/265.32(d)		g. Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems?	х			
		ION K - REQUIREMENTS FOR IGNITABLE, REAMPATIBLE WASTES (PERMITTED FACILITIES		, OR		
264/265.17(a)	23.	Does the facility handle ignitable or reactive waste? If yes:			Х	
		a. Does the owner/operator take the following precautions to prevent accidental ignition or reaction of wastes: Separate and protect ignitable or reactive wastes from sources of ignition or reaction (open flames, smoking, cutting, welding, hot surfaces, frictional heat, static electrical or mechanical sparks, spontaneous ignition, and radiant heat?			х	
264/265.17(a)	24.	Does the owner/operator confine smoking and open flames to specially designated locations, while ignitable or reactive waste is being handled?			Х	
264/265.17(a)	25.	Are "No Smoking" signs placed conspicuously wherever there is a hazard from ignitable or reactive waste?			х	
264/265.17(a)	26.	Does the owner/operator have procedures in place to prevent accidental ignition or reaction of wastes?			X	
264/265.50 through §265.56	SECTI	ON L - CONTINGENCY PLAN				

40 CFR CITATION		REGULATION	YES	NO -	NA	NC
264/265.51(a)	27.	Does the owner/operator have a Contingency Plan, or a Spill Prevention Control and Counter measures (SPCC) Plan, or some other emergency plan, that is amended for hazardous waste management?	X			
264/265.53(a)	28.	Is a copy maintained at the facility?	X			
264/265.53(b)	29.	Has a copy been submitted to all local police and fire departments, hospitals, and State and local emergency response teams?	х			
264/265.52(a)	30.	Does the plan describe the control procedures taken in the event of a fire, explosion, or release?	Х			
	31.	Does the plan describe how and when it will be implemented?	х			
264/265.52(c)	32.	Does the plan describe arrangements agreed to by local police and fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?	х			
264/265.52(d)	33.	Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	х			
264/265.52(d)	34.	Is one person named as the primary coordinator?	X			
264/265.55	35.	Does the coordinator have the authority to commit the resources to carry out the emergency plan?	Х			
264/265.52(e)	36.	Does the plan physically describe and identify the location of all emergency equipment at the facility?	Х			
	37.	Does the plan include provisions to ensure that the equipment is cleaned and fit for its intended use before operations are resumed?	х			
264/265.52(f)	38.	Does the plan include an evacuation plan for facility personnel?	х			
264/265.52(f)	39.	Does the plan describe:				
		a. Signal(s) to be used to begin evacuation?	X			
		b. Evacuation routes?	X			
264/265.56(a)		c. Does the plan describe the methodology for immediate notification of:				
		 Facility personnel? 	X			
		2. State or local agencies with designated response roles?	х			
264/265.56(b)	40.	Does the plan include procedures for identification of released materials?	Х			
264/265.56(c)	41.	Does the plan include procedures/criteria to assess possible hazards to human health and the environment that may result from the release, fire, or explosion?	х			
264/265.56(e)	42.	Does the plan describe all reasonable measures necessary to ensure that fires, explosions, or releases do not occur, reoccur, or spread to other hazardous waste at the facility?	х			
264/265.56(f)	43.	Does the plan describe procedures to monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment if the facility stops operation in response to a fire, explosion, or release?	х			

40 CFR CITATION			REGULATION	YES	NO	NA	NC
	12.50		- NECESSARY AGREEMENTS WITH THORITIES				
264/265.37(a)	44.		the owner/operator made the following gements:				
		a.	Familiarized police, fire departments, and emergency response teams with the layout of the facility and associated hazards?	х			
		b.	Designated one police and fire department with primary emergency authority when more than one might respond?	х			
		c.	Agreements with State emergency response teams, contracts, and equipment supplies?	х			
·		d.	Familiarized local hospitals with the properties of waste handled at the facility and the types of injuries or illness that could result?	х			
264/265.37(b)	45.	arran	re authorities decline to enter into such gements, has the owner/operator documented efusal?			х	

COMMENTS:

5. The job description for the "warehouse worker' should be expanded to include the responsibilities regarding hazardous waste.

M

name chy.

HAZARDOUS WASTE DATA MANAGEMENT SYSTEM MAINTENANCE FORM FOR NOTIFICATION

EPA-ID +	14141D141412161714	13:111 Date: 6/1/90
FACILITY W	AMB Altovista	Ylass Fabrics Plant
New Facili	ty Nasa Industries Inc	ン .
Contact Pe	rean/Pasition	
(Last,	first, H)	Title Tel Mg
MAILING		
ADDRESS		
LOCATION	Street	
ADDRESS	City	State519
County Mas	10	County Code
Ovner Name RGF Ind	Instries G'Boro Mc	Operator Name
5. Har	Code Tr Ted rket er Burn HWF Gen Hark te Burn Other Harketer Burnes	Ged Oil Fuel Activities 6. Off-Spec Used Oil Fuel A. Gen Mark to Burn B. Other Marketer G. Burner 7. Spec Used Oil Fuel Mark
		Contration Device _ Ind. Seiler Ind. Furnace
Mode of T	respertation (Trans	perters Only) hvey Water Other
Heintone	ace Screens	
Existing Weste Code	Vi Card Nov Weste Cede	;

SEPA

United States Environmental Protection Agency Washington, DC 20460 Notification of Hazardous Waste Activity

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

DEFA Notification	on of Hazardou	is wasta	Activity	3010 of the Resource Conservati and Recovery Act).	
For Official Use Only			roministration	The state of the s	
	Сог	nments		C171819202	
C		* * * * * * * * * * * * * * * * * * * *		A CONTRACTOR OF THE PROPERTY O	
		T	Date Bece	Man /	
Installation's EPA ID N	·····	Approved	(yr. mo.	State ZIP Code V A Z 4 S 1 7 Phone Number (area code and number) B. Type of Ownership (enter code) Corporation B. Used Oil Fuel Activities discision Used Oil Fuel Activities discision Used Oil Fuel Marketer (or On site Burner) to Claims the Oil Meets the Specification inter boxes to indicate type of combustion device(s) in redefinitions of combustion devices.) C. Industrial Furnace priate box(es)	
F	T/A C			E Paris 7	
I. Name of Installation					
BGF INDUS	TRIES	INC		38 45 5 MENT	
II. Installation Mailing Address				and the property of the second	
c 401 AMHE	RST AV	P.O. Box			
GALTAVIST	City or Town			State ZIP Code VAZ 451	
III. Location of Installation		and By th	A		
	Street or R	oute Number			
5 401 AMHE,	RST AU	と			
CALTAVISTA	City or Town			State 21 Code	
IV. Installation Contact		*	the Market State of the Control		
	(last, first, and job title)	· · · · · · · · · · · · · · · · · · ·	Pho	one Number (area code and number)	
CJONES CHI	ARLES	CHE	M. 80	43694751	
V. Ownership	and the sixty of t	e alternative and and an experience of the con-	e galace de la Se distribución de la Calación de l La Calación de la Cal		
G B G F I NO U S	of Installation's Legal Owner TRIES	GB	ORONC		
VI. Type of Regulated Waste Activ	ity (Mark 'X' in the ap)	propriate bo	xes. Refer to ins		
A. Hazardous Waste A			B. Used C	Oil Fuel Activities	
· ·	ess than 1,000 kg/mo.	6. Off-Sp	ecification Used Oi	l Fuel oriste hoxes below!	
☐ 2. Transporter☐ 3. Treater/Storer/Disposer		l			
4. Underground Injection		l	. Other Marketer	•	
5. Market or Burn Hazardous Waste Fue		□ 0	. Burner		
a. Generator Marketing to Burne	•	7. Specif	ication Used Oil Fu	el Marketer (or On site Burner)	
□ b. Other Marketer□ c. Burner	·	Who F	irst Claims the Oil I	Meets the Specification	
Which hazardous waste fuel or off-specification A. Utility Boiler	on used oil fuel is burned. S B. Industria			•	
VIII. Mode of Transportation (trans					
		ner (specify)			
IX. First or Subsequent Notification	n la		* 9		
Mark 'X' in the appropriate box to indicate v notification. If this is not your first notification	vhether this is your installa				
☐ A. First Notification	nt Notification <i>(complete iten</i>	7 C)	C. Ins	tallation's EPA ID Number	

	ID — For Official	Use Only
	C W	T/A C
X. Description of Hazardous Wastes (continued from fro	ont) Brown and the second	
A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit from nonspecific sources your installation handles. Use additional states.	number from 40 CFR Part 261.31 for each	listed hazardous waste
1 2 3	4 5	6
7 8 9	10 11	12
B. Hazardous Wastes from Specific Sources. Enter the four-digit num specific sources your installation handles. Use additional sheets if n		ed hazardous waste from
13 14 15	16 17	18
19 20 21	22 23	24
25 26 27	28 29	30
C. Commercial Chemical Product Hazardous Wastes. Enter the four- your installation handles which may be a hazardous waste. Use addi	digit number from 40 CFR Part 261.33 for elitional sheets if necessary.	each chemical substance
31 32 33	34 35	36
0001 0002 0009		
37 38 39, .	40 41	42
43 44 45	46 . 47	48
D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR pitals, or medical and research laboratories your installation handles	Part 261.34 for each hazardous waste from Use additional sheets if necessary.	hospitals, veterinary hos-
49 50 51	52 53	54
E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the box your installation handles. (See 40 CFR Parts 261.21 — 261.24)	es corresponding to the characteristics of	nonlisted hazardous wastes
☑ 1. Ignitable ☑ 2. Corrosive	3. Reactive	4. Toxic
(Ď001) (D002)	(D003)	(D000)
XI. Certification		
I certify under penalty of law that I have personally exa this and all attached documents, and that based on m obtaining the information, I believe that the submitted in there are significant penalties for submitting false infor	y inquiry of those individuals imme nformation is true, accurate, and co	ediately responsible for mplete. I am aware that
Signature Name and O CAR PAR	official Title (type or print) les El Joves wt Chemist	Date Signed 5 21/90
EPA Form 9700-12 (Rev. 11-85) Reverse		7 7

GENERAL STATE SECTION

MAY 2 9 1990

EPA, B3

BGF Industries, Inc.

(Formerly Burlington Glass Fabrics)

May 21, 1990

Mr. S. Ashton
Commonwealth of Virginia
Dept. of Waste Management
11th Floor, Monroe Bldg.
101 N. 14th Street
Richmond, VA 23219

Dear Mr. Ashton:

In reviewing hazardous waste activity records, I noted that your files still carry our former company name (Burlington Glass Fabrics Co.). Per our conversation, the proper name and ID is shown on the attached 8700-12. If you need further information, please advise.

Thanks for your assistance.

Truly yours,

Charles E. Jones Plant Chemist

CEJ;ss

att,

Copy: S. Goodwin



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CHARLEY TENDER SECTION

United States Environmental Protection Agency Washington, DC 20460

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	4:					
	7	8	9	10	11	12
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Б.	Hazardous Wastes from S specific sources your insta	Hation handles. Use	er the four-digit number additional sheets if nece	r from 40 CFR Part 261. essary.	32 for each listed	nazardous waste from
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XI.	. Certification				18 18	
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EPA Form 8700-12 (Rev. 11-85) Reverse

BGF Industries, Inc. 3330 West Friendly Avenue Greensboro, North Carolina 27410

March 3/, 1988

Virginia Department of Health Division of Hazardous Waste Management 101 North Fourteenth Street 11th Floor Monroe Building Richmond, Virginia 23219

Subject: EPA Identification No. VAD119071314

Transfer of Ownership from Burlington Industries, Inc. to BGF Industries, Inc.

Altavista Plant

Gentlemen:

This notice supplements the enclosed EPA Form 8700-12 and is sent to inform you that ownership of the Altavista plant of Burlington Industries, Inc. has been transferred to BGF Industries, Inc. effective March 21, 1988. The EPA identification number for the facility is VAD119071314.

Please direct all correspondence concerning the plant to:

Charley Jones
Plant Chemist
401 Amherst Avenue
P. O. Box 592
Altavista, Virginia 24517
(804)369-1246

Sincerely,

BGF Industries, Inc.

By: Sph a. Gu

cc: Charley Jones

enclosure

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Please print of type with ELITE type (12 characters per inch) in the unshaded areas only

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K] A . 1	First	Notifi	catio	'n	□ f	3. Su	bseq	uent l	Notif	catio	n (co	mple	te ite	m C)				and the same	THE PARTY OF	J. 10	Jidne				-		Z=a:15	Ī

		10	 For Official Use Or 	il y
				T/A
Description of Hazardous Wastes (conti	nued from front			
lazardous Wastes from Nonspecific Sources. Ent rom nonspecific sources your installation handles.	er the four-digit nun	nber from 40 CFR Part 2	61.31 for each listed h	azardous waste
2	3	4	5	6
7 8	9	10	11	12
azardous Wastes from Specific Sources. Enter the pecific sources your installation handles. Use addition			12 for each listed hazar	dous waste from
13 14	15	16	17	18
19 20	21	22	23	4
25 26	27	28	29	30
37 38	39	40		42
43 44	48	46	47	48
sted Infectious Wastes. Enter the four-digit numb				tals, veterinary hos-
49 50	51	52	53	54
naracteristics of Nonlisted Hazardous Wastes. M	lark 'X' in the boxes	corresponding to the ch	aracteristics of nonlist	ed hazardous wastes
ur installation handles. (See 40 CFR Parts 261.21				₩ 4. Toxic
	Corrosive (D002)	☐ 3. Reactiv (D003)		(D000)
Certification				
certify under penalty of law that I have penalty of law that I have penalty and all attached documents, and that the obtaining the information, I believe that the character are significant penalties for submitted.	at based on my in he submitted info	nquiry of those indi irmation is true, acc	viduals immediate urate, and complet	ly responsible for e. I am aware tha
ature/	Name and Office	cial Title (type or print)		te Signed
hale & Jane	Charles E		0/	19/86

EPA Form 8700-12 (Rev. \$1-85) Reverse

RECEIVED WV/VA SECTION

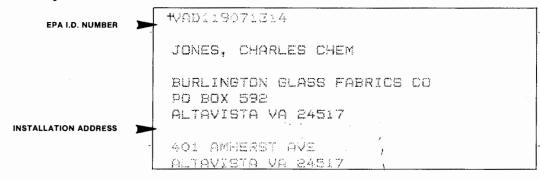
SEP 25 1986



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act(RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.



EPA Form 8700-12B (4-80)